

Approved by: Lori L. Doughty
LORI DOUGHTY
Special Assistant United States Attorney

ORIGINAL

Before: THE HONORABLE MARTIN R. GOLDBERG
United States Magistrate Judge
Southern District of New York

21 MJ 07467

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UNITED STATES OF AMERICA : MISDEMEANOR
 : COMPLAINT
 :
-v- : Violation of
 :
ZICO K. GAYNOR : NYVTL 511
 :
 : COUNTY OF OFFENSE:
Defendant : ORANGE
-----x

SOUTHERN DISTRICT OF NEW YORK, ss.:

Lucas Olson
~~Victor A. Vazquez~~, being duly sworn, deposes and says
that he is a Court Liaison assigned to the Provost Marshal
Office, at the United States Military Academy, West Point,
New York, and charges as follows:

COUNT ONE

On or about April 21, 2021, at the United States
Military Academy, West Point, New York, within the special
maritime and territorial jurisdiction of the United States,
in the Southern District of New York, ZICO K. GAYNOR, the
defendant, unlawfully, knowingly and willfully operated a
motor vehicle upon a public road while knowing, or having
reason to know, that his license to operate such motor
vehicle in New York was suspended, revoked, or otherwise
withdrawn by the commissioner, to wit, the defendant was
observed operating his motor vehicle at Stony Lonesome gate
and an investigation revealed that the defendant's license
was suspended.

(New York Vehicle and Traffic Law, Section 511)

The basis for the deponent's knowledge and for the
foregoing charges are, in part, as follows:

1. I am Court Liaison, assigned to the Provost Marshal
Office, at the United States Military Academy, West Point,
New York, which is located in the Southern District of New

York.

2. On or about April 21, 2021 at approximately 9:50 a.m., the defendant was attempting to gain access to the West Point Military Installation via the Stony Lonesome gate when the gate guard detected an odor of marijuana. The defendant was asked to pull off to the side. When the Military Police arrived and conducted a check on the defendant's driver's license, it was discovered that the license was suspended as of 21 February 2021 the defendant's license was suspended for failing to answer a summons.

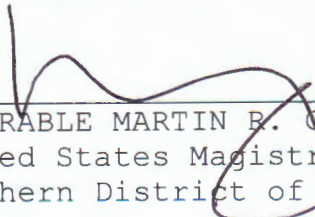
3. The defendant was issued a District Court Violation Notice for operating a motor vehicle while license was suspended or revoked (DCVN number 8005346/SY10) and was released on his own recognizance.

WHEREFORE, deponent prays that the above defendant be imprisoned or bailed, as the case may be.



~~VICTOR A. VAZQUEZ~~ *Lucas*
Court Liaison

Sworn to before me this
30th day of July, 2021



HONORABLE MARTIN B. GOLDBERG
United States Magistrate Judge
Southern District of New York